CHRISTOPHER H. FITZGERALD ATTORNEY AT LAW

233 Broadway, Suite 2348 New York, NY 10279 t. (212) 226-2275 f. (212) 226-3224 CFitzgerald@CHFLegal.com

Admitted to practice: State of New York
State of New Jersey

April 21, 2017

Via ECF

The Honorable Analisa Torres United States District Judge Southern District of New York 500 Pearl Street, Courtroom 15D New York, NY 10007

Re: Floyd, et al. v. City of New York, et al., 08-CV-1034 (AT)
Ligon, et al. v. City of New York, et al., 12-CV-2274 (AT)

Davis, et al. v. City of New York, et al., 10-CV-0699 (AT)

Your Honor:

My office serves as counsel to The Leadership Conference on Civil and Human Rights, proposed *amici curiae* in the above-referenced matters.

The Leadership Conference on Civil and Human Rights ("The Leadership Conference") is a nationwide coalition of more than 200 organizations charged with promoting and protecting the civil and human rights of all persons in the United States. The Leadership Conference brings a unique national perspective on the use of body-worn cameras by law enforcement. We have been actively monitoring and evaluating the body-worn camera policies developed by our nation's major police departments, and whether these policies protect the civil rights of recorded individuals. In support of the *Floyd* plaintiffs' objections to the Monitor's April 11, 2017 "Memorandum to the Court regarding the Approval of Body-Worn Camera Policies", we respectfully request permission to file the attached *amicus curiae* statement.

As Your Honor is aware, "[f]ederal courts have discretion to permit participation of *amici* where such participation will not prejudice any party and may be of assistance to the court." *Strougo v. Scudder, Stevens & Clark, Inc.*, 96 Civ. 2136 (RWS), 1997 U.S. Dist. LEXIS 12243, *7 (S.D.N.Y. Aug. 18, 1997) (*citing Vulcan Society of New York City Fire Dep't, Inc. v. Civil Service Comm'n*, 490 F.2d 387, 391 (2d Cir. 1973). As such, the Leadership Conference respectfully submits that the motion for leave to file the accompanying *amicus curiae* statement should be granted.

Respectfully	Submitted,
--------------	------------